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Counsel for the Debtor

**IN THE DISTRICT COURT OF GUAM
TERRITORY OF GUAM
BANKRUPTCY DIVISION**

In re

ASIA PACIFIC FINANCIAL
MANAGEMENT GROUP, INC., ¹

Debtor.

Case No. 23-00005

Chapter 11

**STIPULATION TO EXTEND DEADLINE
TO OBJECTION TO CONFIRMATION
OF THE FIRST AMENDED PLAN OF
REORGANIZATION**

Subject to the Court’s approval, Asia Pacific Financial Management Group, Inc. (the “Debtor”) and the United States Trustee (the “UST”) stipulate as follows with respect to the extension of the deadline for the UST to file and serve a written objection to the *First Amended Plan of Reorganization of Asia Pacific Financial Management Group, Inc. dated September 15, 2023 with Incorporated Adequate Disclosures under Section 1190(1) of the Bankruptcy Code* [Docket No. 137] (the “Plan”).

On October 4, 2023, the Court entered the *Order Regarding Fixing of Deadlines Under Bankruptcy Rule 3017.2* [Docket No. 143] (the “Scheduling Order”). Among other things, the Scheduling Order fixed certain dates and deadlines in connection with confirmation of the Plan.

¹ The last four digits of the taxpayer identification number of Asia Pacific Financial Management Group, Inc. are 3272. The principal office of Asia Pacific Financial Management Group, Inc. is 145 Aspinall Avenue, Hagåtña, Guam 96910

Pursuant to the Scheduling Order, the deadline for parties in interest to file and serve written objections to confirmation of the Plan is November 3, 2023 (the “Objection Deadline”). A hearing on confirmation of the Plan will be held on November 21, 2023 at 8:00 a.m. (CHST) (the “Confirmation Hearing”).

The Debtor and the UST are working cooperatively to narrow and resolve objections to the Plan prior to the Confirmation Hearing, and believe that an extension of the Objection Deadline for the UST will reduce the need for judicial determination of issues and conserve estate resources.

Accordingly, the Debtor and the UST stipulate as follows:

- A. the deadline for the UST to file and serve written objections to confirmation of the Plan shall be extended until **November 8, 2023**;
- B. for the avoidance of doubt, the Objection Deadline for all other parties shall not be extended unless otherwise ordered by the Court; and
- C. prior to the Confirmation Hearing, the Debtor shall file a revised Plan, in both clean and redline formats, incorporating modifications of the Plan agreed to with the UST.

SO STIPULATED.

Dated: November 2, 2023

Respectfully submitted,

CIVILLE & TANG, PLLC

/s/ Joyce C.H. Tang

JOYCE C.H. TANG

DENTONS BINGHAM GREENEBAUM LLP

/s/ Andrew C. Helman

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Counsel for the Debtor

and

TIFFANY L. CARROLL

ACTING UNITED STATES TRUSTEE

/s/ Neil Verburgge

NEIL VERBRÜGGE

Counsel for the United States Trustee

Dated: November __, 2023

Hon Frances M. Tydingco-Gatewood
Chief Judge, United States District Court
Territory of Guam